

The Honorable Timothy W. Dore
Chapter 13
Hearing Date: December 21, 2011
Hearing Time: 9:30 am
Hearing Location: US Courthouse, Seattle, WA
Response Due Date: December 14, 2011

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

IN RE:

CHING Y. LIN,

Debtor(s).

Case No. 11-23376 - TWD

DECLARATION OF COUNSEL
IN SUPPORT OF MOTION FOR
CONTINUANCE OF AUTOMATIC
STAY AND EXTENSION OF
DEADLINE FOR HEARING OF
SAME

I, Christina L. Henry hereby declares as follows:

1. My name is Christina L. Henry and I am the Debtor's bankruptcy attorney in this case and I have personal knowledge of the information in this declaration.

2. The Debtor's prior bankruptcy case, case# 11-18917, was dismissed by the Chapter 13 Trustee's Motion to Dismiss because her plan was not feasible.

3. After reviewing the prior bankruptcy case and the Debtors' financial situation I could not understand why the Debtor's prior bankruptcy attorney did not amend her plan and increase the plan payment.

IN SUPPORT OF MOTION FOR CONTINUANCE OF
AUTOMATIC STAY AND EXTENSION OF DEADLINE
FOR HEARING OF SAME - 1
(000032)

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4. Since the filing, the Debtor allowed one of her houses to foreclose and has moved into the house she is declaring as her homestead. The foreclosure has reduced her secured debt and simplified the issues in her Chapter 13 Plan.

5. After meeting with the Debtor, I reviewed her paystubs and obtained a declaration from her boyfriend who is willing to contribute \$2000 a month to her bankruptcy plan. I instructed the Debtor to claim all her tips on her paystubs going forward to prove that she has enough income to pay the proposed Chapter 13 Plan. With these changes, I believe the Debtor has enough money to support the Chapter 13 Plan proposed and that these changes are significant enough to support a change in circumstances to support this Motion to Continue the Automatic Stay.

6. I was also out of town last week and did not file this Motion in enough time to get it on calendar within 30 days of the bankruptcy filing on November 17, 2011.

7. However, a hearing on December 21st is only four days beyond the December 17th deadline and I request an extension to that date.

I CERTIFY UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
OF WASHINGTON THAT THE FOREGOING STATEMENT IS BOTH TRUE AND
CORRECT.

EXECUTED this 27th day of November 2011, at Seattle, Washington.

/s/ Christina L. Henry
Christina L. Henry